

***BY ELECTRONIC MAIL AND MAIL***

June 26, 2006

Robert Schneider, Chair  
Members of the Regional Board  
c/o Philip Giovannini  
California Regional Water Quality Control Board,  
Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670-6114

Re: August 3/4 Regional Board Meeting – Tentative Waste Discharge  
Requirements for the Port of Stockton West Complex Docks 14 and 15  
Dredging Project

Dear Chairman Schneider and Members of the Board:

On behalf of the Deltakeeper Chapter of Baykeeper (Deltakeeper Chapter), I am submitting comments on the Tentative Waste Discharge Requirements (“WDRs”) for the Port of Stockton (“Port”) West Complex Docks 14 and 15 Dredging Project (“Project”). I request that Regional Water Quality Control Board, Central Valley Region (“Regional Board”) consider these comments before its August 3/4 meeting.

The San Joaquin River struggles to maintain a healthy ecosystem and drinking water supply. Yet, despite the current tenuous state of these waters, the proposed WDR does not require the Port to enact sufficient measures to the waters of the state. Specifically, the WDR fails to appropriately prevent invasive species, regulate dredging impacts, regulate dredge spoil disposal, or to mitigate dissolved oxygen depletion. For these reasons, the proposed WDR is simply not adequate to meet the Basin Plan objectives of protecting the beneficial uses for the Sacramento-San Joaquin Delta, including habitat protections.

Furthermore, despite the science demonstrating the propensity for dredge spoils to leach contaminants to groundwater, the WDR does not comply with state anti-degradation policies as it fails to regulate dredge spoils as a designated waste in order to protect groundwater from metals and other toxins.

Not only has the region witnessed steep decline in pelagic species throughout the Delta but also the listing of the Green Sturgeon as a threatened species just this past April. The fishermen and members of Deltakeeper who enjoy the San Joaquin right here in the Stockton area depend on the Regional Board to adequately protect this important natural resource and the groundwater vital to

so many regional needs. With a project of this scale, it is imperative to ensure appropriate environmental review and adequate regulation of the impacts the project may have to our waters.

The Deltakeeper Chapter will provide the Board with more specific comments on these concerns and recommendations for alternatives later this week. If you have questions, please feel free to contact me at the numbers provided below.

I appreciate the time your staff has put into this issue and the opportunity for Deltakeeper to submit comments.

Sincerely,  
Carrie McNeil DVM  
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